

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK  
BROOKLYN DIVISION**

IRIS ABAEV,

Plaintiff,

vs.

CENTENE MANAGEMENT COMPANY  
LLC,

Defendant.

Case No.: 1:25-cv-1511 (RER) (VMS)

**AFFIRMATION IN SUPPORT  
OF REQUEST FOR  
CERTIFICATE OF DEFAULT**

Emanuel Kataev, Esq., an attorney admitted to practice law before this Court declares pursuant to 28 U.S.C. § 1746 as follows:

1. I am counsel for Plaintiff in this matter, and I am fully familiar with the facts herein.
2. I respectfully submit this declaration in support of Plaintiff's request for entry for default.
2. This action was commenced on March 18, 2025, by the filing of the Complaint ([see](#) Docket Entry [1](#)), to recover compensatory and punitive damages, costs and attorneys' fees against Defendant Centene Management Company LLC (hereinafter "Defendant") for violations of the Americans with Disabilities Act of 1990, 42 U.S.C. § 12101, *et seq.* ("ADA"); the New York State Human Rights Law, New York State Executive Law § 296 ("NYSHRL"), and the New York City Human Rights Law, New York City Administrative Code § 8-502(a) ("NYCHRL").
3. Defendant was served by registered agent on March 24, 2025. [See](#) ECF Docket Entry [6](#). Pursuant to Rule 12(a)(1)(A)(i) of the Federal Rules of Civil Procedure (hereinafter "Rules" or "Rule"), Defendant was required to respond within twenty-one (21) days on April 14, 2025.
3. The time for Defendant to answer or otherwise respond with respect to the complaint herein has expired.

4. Defendant has not answered or otherwise moved with respect to the complaint, and the time for defendants to answer or otherwise move has not been extended.

5. The Defendant is not infant or incompetent.

6. Because it is a corporate entity, Defendant is not presently in the military service of the United States as appears from facts in this litigation.

WHEREFORE, plaintiff Iris Abaev requests that the default of defendant be noted and a certificate of default issued.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 24, 2025.

Dated: New York,  
April 24, 2025

**CONSUMER ATTORNEYS, PLLC**

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